

claims 43 to 50 correspond to claims 63 to 70 from the parent, and claims 51 to 56 correspond to claims 72 to 77 from the parent.

Claim 49, which corresponds to claim 69 from the parent, has been amended into dependent form. Claim 40, which corresponds to claim 57 from the parent, has been amended to recite that the plurality of operating systems are implemented on the recited file server. Several additional changes have been made to correct minor informalities.

Furthermore, "steps for" terminology has been replaced with "steps of" terminology in the method claims, thereby emphasizing that these claims are not within the ambit of 35 U.S.C. 112, paragraph 6. These changes have not been made for reasons related to patentability.

#### Claim Rejections in Parent

The claims in the parent corresponding the pending claims herein were all rejected under 35 U.S.C. 103(a) over U.S. Patent No. 5,675,782 (Montague). Applicants respectfully submit that a rejection of the pending claims under section 103(a) over Montague would not be proper for at least the following reasons.

Claim 31 recites a method of operating a file server. The method includes steps of identifying a first file on the file server with a first security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on the file server, and enforcing the first security style for all accesses to the first file.

Claim 40 also recites a method of operating a file server. The method of claim 40 includes the steps of identifying a first file on the file server with a first security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on the file server, enforcing the first security style for all accesses to the file server, and identifying the first file with a second security style selected from among the plurality of security styles in response to a file server request.

Claim 43 recites a file server including a set of files available on the file server, each file having an associated security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on the file server. According to claim 43, the file server enforces the associated security style for all accesses to the file.

Claim 51 recites a data structure in a file server having a plurality of files. The data structure of claim 51 associates a security style with each file, the security style being selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on the file server.

Each of these independent claims involves and recites a security style selected from among a plurality of security styles corresponding to a plurality of operating systems implemented on a file server. Montague simply is not seen to be concerned with such file servers that implement a plurality of operating systems.

In more detail, as recited in its Abstract, Montague concerns "controlling access to entities on a network on which a plurality of servers are installed that use different operating

systems." Plural servers using different operating systems is different from a server that implements plural operating systems (and hence security styles).

The closest that Montague is seen to come to discussing a single server that implements a plurality of operating systems is at column 6, line 65, to column 7, line 2, which discusses block 50 of Figure 2. This block is labeled "Other Operating Systems – If Applicable." A close reading of column 6, line 65, to column 7, line 2, reveals that this block is merely meant to be a "catch-all" to cover operating systems not specifically named by Montague. The rest of Montague simply is not seen to discuss or address operation of a server that implements plural operating systems and corresponding security styles.

The fact that Montague does not discuss a server that implements plural operating systems flows from the focus of Montague's disclosure. A careful reading of Montague's Background of the Invention reveals that Montague is concerned with controlling access to objects on different servers, each of which is running a different operating system. The invention, in contrast, is concerned with controlling access and permissions for objects implemented on a file server using different security styles corresponding to different operating systems implemented on that server.

In short, Montague is understood to concern multiple servers that each implement a possibly different operating system. The invention concerns a file server that itself implements multiple operating systems and corresponding security styles.

The foregoing discrepancy between Montague and the invention was not addressed by the Apr. 2001 Office Action in the parent. In particular, the rejection of claim 42 in

the parent (now claim 31) at page 3 of the Office Action alleged that Montague taught "identifying a first file on the file server with a first security style selected from among a plurality of security styles." However, this rejection apparently ignored claim 42's (now claim 31's) limitation that the plurality of security styles correspond to a plurality of operating systems implemented on the file server.

The Apr. 2001 Office Action was likewise deficient in its rejections of claims 63 and 72 in the parent (now claims 43 and 51). While claim 57 in the parent (now claim 40) did not recite that the plurality of security styles correspond to a plurality of operating systems implemented on a file server, that claim has been amended herein to recite this limitation.

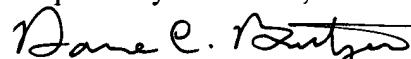
Thus, Applicants respectfully submit that the now-pending claims clearly are not obvious over Montague under 35 U.S.C. 103(a).

Closing

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at (614) 486-3585. All correspondence should continue to be directed to the address indicated below.

Respectfully submitted,



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Changes to Specification

Pursuant to 37 C.F.R. § 1.121(b)(iii), changes to the specification effected by the accompanying paper are indicated below.

Page 1, line 16, the following paragraph has been inserted:

-- This application is a continuation of application serial no. 09/035,234 filed Mar.  
3, 1998.--

Changes to Claims

Pursuant to 37 C.F.R. § 1.121(c)(ii), changes to any claims effected by the accompanying paper are indicated below.

Claims 1 to 30 have been cancelled without prejudice or disclaimer of subject matter.

Claims 31 to 56 have been added.